

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-8909

NOV 1 9 1997

4WD-RCRA

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Williams Environmental Coordinator Randall Textron Company 635 Highway 332 Grenada, Mississippi 38901

SUBJ: Final RCRA Facility Assessment (RFA) Report

Randall Textron Company EPA ID No. MSD 007 037 278

Dear Mr. Williams:

The U.S. Environmental Protection Agency (EPA), Region 4 has reviewed the comments submitted for the Draft RFA Report. As discussed with Ms. Lael Butler of my staff, enclosed is the Final RFA Report. To review, an RFA is the first step of the RCRA permitting process and is designed to identify solid waste management units (SWMUs) and areas of concern (AOC) which have a potential for release of hazardous wastes or hazardous constituents to the air, surface water, soil or ground water. During the RFA, information is gathered to determine where SWMUS and AOCs exist, what material(s) is managed or have been managed in the past and effects, if any, have occurred with respect to the environment via the pathways listed previously. For each unit, SWMU or AOC, an environmental assessment is completed in order to determine the type of cleanup action necessary.

The Final RFA Report serves as the basis for the issuance of the Hazardous and Solid Waste (HSWA) portion of your RCRA permit and any corrective action required by the HSWA permit. The Final RFA Report identified a total of 26 SWMUs and 3 AOCs. Of these, confirmatory sampling is recommended at 2 SWMUs and 1 AOC to determine whether a release has occurred:

- Wastewater Treatment Plant (SWMU 13),
- Process Sewers (SWMU 15), and
- Fuel Tank Farm Containment Area (AOC A).

Also, a RCRA Facility Investigation (RFI) is recommended at 6 SWMUs and 2 AOCs to determine the nature and extent of contamination:

- Equalization Lagoon (SWMU 2),
- On-Site Landfill (SWMU 3),
- Sludge Lagoon (SWMU 4),
- Outfall Ditch (SWMU 7),
- Wet Well (SWMU 12), and

Destruct Pit (SWMU 12),

Former Trichloroethylene Storage Area (AOC A), and Former Toluene Underground Storage Tank Area (AOC B).

No further action is suggested for the remaining 18 SWMUs that are not listed here. Please note that the HSWA Permit will reflect these findings.

During the Visual Site Inspection (VSI) which was conducted January 7-8, 1997, each of the 26 SWMUs and the 3 AOCs identified during either the Preliminary Review (i.e., the file review) or the VSI were discussed. For the 6 SWMUs and the 2 AOCs where the Final RFA Report recommends an RFI, there is a specific reference to the Remedial Investigation (RI) that was conducted by a consultant, Eckenfelder, Inc., during the early 1990s. This reference is also stated in the "Comments" section for each of the SWMUs and AOCs individually described in the Final RFA Report. The EPA proposes to write language into the HSWA Permit which will trigger the RFI with a document submittal requirement.

Your copy of the Final RFA Report does not have a set of color photographs included. A full set of color photographs was contained in the previous transmittal, the Draft RFA Report. Please remove Appendix B, Photographic Log, from the Draft RFA Report and place it in the Final RFA Report. Lastly, inside the Final RFA Report there is a 3.5-inch computer diskette which contains the document in WordPerfect 6.1 format.

Should you have questions or comments with regard to the information contained in the Final RFA Report, or about the Draft HSWA Permit now in preparation, please contact Ms. Butler, South Programs Section, RCRA Programs Branch at (404)562-8453.

Sincerely,

Narindar M. Kumar

Chief, RCRA Programs Branch Waste Management Division

Enclosure

cc: Tim Aultman, MDEQ (w/enclosure)

John Bozick (w/Final RFA Report on diskette) Rockwell International 2135 West Maple Road Troy, Michigan 48084-7186